

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

ROTHSCHILD PATENT IMAGING LLC,

Plaintiff,

v.

**BH SECURITY, LLC d/b/a BRINKS
HOME SECURITY,**

Defendant.

C.A. No. 3:25-cv-650

JURY TRIAL DEMANDED

PATENT CASE

ORIGINAL COMPLAINT FOR PATENT INFRINGEMENT

Plaintiff Rothschild Patent Imaging LLC files this Original Complaint for Patent Infringement against BH Security, LLC d/b/a Brinks Home Security and would respectfully show the Court as follows:

I. THE PARTIES

1. Plaintiff Rothschild Patent Imaging LLC (“RPI” or “Plaintiff”) is a Texas limited liability company having an address at 1 East Broward Boulevard, Suite 700, Ft. Lauderdale, FL 33301.

2. On information and belief, Defendant BH Security, LLC d/b/a Brinks Home Security (“Brinks” or “Defendant”) is a Delaware limited liability company with a regular and established place of business at 1990 Wittingham Pl., Farmers Branch, TX 75234-1904. Defendant has a registered agent at Corporation Service Company d/b/a CSC-Lawyers Incorp, 211 E. 7th Street, Suite 620, Austin, TX 78701.

II. JURISDICTION AND VENUE

3. This action arises under the patent laws of the United States, Title 35 of the United States Code. This Court has subject matter jurisdiction of such action under 28 U.S.C. §§ 1331 and 1338(a).

4. On information and belief, Defendant is subject to this Court's specific and general personal jurisdiction, pursuant to due process and the Texas Long-Arm Statute, due at least to its business in this forum, including at least a portion of the infringements alleged herein at 1990 Wittingham Pl., Farmers Branch, TX 75234-1904.

5. Without limitation, on information and belief, Defendant has derived revenues from its infringing acts occurring within Texas. Further, on information and belief, Defendant is subject to the Court's general jurisdiction, including from regularly doing or soliciting business, engaging in other persistent courses of conduct, and deriving substantial revenue from goods and services provided to persons or entities in Texas. Further, on information and belief, Defendant is subject to the Court's personal jurisdiction at least due to its sale of products and/or services within Texas. Defendant has committed such purposeful acts and/or transactions in Texas such that it reasonably should know and expect that it could be sued in this Court as a consequence of such activity.

6. Venue is proper in this District under 28 U.S.C. § 1400(b). On information and belief, Defendant has a regular and established place of business in Texas and in this District at 1990 Wittingham Pl., Farmers Branch, TX 75234-1904. On information and belief, from and within this District, Defendant has committed acts of infringement, including at least a portion of the infringements at issue in this case.

7. For these reasons, personal jurisdiction exists and venue is proper in this Court under 28 U.S.C. § 1400(b).

III. COUNT I
(PATENT INFRINGEMENT OF UNITED STATES PATENT NO. 8,437,797)

8. Plaintiff incorporates the above paragraphs herein by reference.

9. On May 7, 2013, United States Patent No. 8,437,797 ("the '797 Patent") was duly and legally issued by the United States Patent and Trademark Office. A true and correct copy of the '797 Patent is attached hereto as Exhibit A and incorporated herein by reference.

10. RPI is the assignee of all right, title, and interest in the '797 patent, including all rights to enforce and prosecute actions for infringement and to collect damages for all relevant times against infringers of the '797 Patent. Accordingly, RPI possesses the exclusive right and standing to prosecute the present action for infringement of the '797 Patent by Defendant.

11. The '797 Patent relates to the field of systems and methods for distributing photographic images from a capturing device with photographic capabilities and cooperatively structured to automatically wirelessly transmit to a second image-capturing device using selective transfer criteria. (Ex. A at 1:14-21). The invention addressed a technological problem of transmitting photographic images between image-capturing devices based on the geographic location of one of the image-capturing devices. (*Id.* at 1:44-2:7). There were problems with prior art system including requiring attaching photographic images to emails for transmission or personally uploading an image to a central storage that must then be accessed by users of other devices. (*Id.* at 1:58-63). As a result, there was a need for an image distribution system and method which is structured to dispose image-capturing devices in a communicative relation with receiving image-capturing devices for instantaneous, automatic, and/or selective distribution of images therebetween. (*Id.* at 2:8-12).

12. The claims of the Asserted Patents do not merely recite the performance of some well-known business practice from the pre-Internet world along with the requirement to perform

it on the Internet. Instead, the claims of the Asserted Patents recite inventive concepts that are deeply rooted in engineering technology and overcome problems specifically arising out of capture and transmission of images in a distributed environment. In addition, the claims of the Asserted Patents recite inventive concepts that improve the functioning of devices for transmission and reception of data. Moreover, the claims of the Asserted Patents recite inventive concepts that are not merely routine or conventional use of computer components. Instead, the patented inventions disclosed in the Asserted Patents provide a novel solution to specific problems related to digital information. The patented inventions disclosed in the Asserted Patents do not preempt all the ways of transmitting images or digital information, nor do the Asserted Patents preempt any other well-known or prior art technology. Accordingly, the claims in the Asserted Patents recite a combination of elements sufficient to ensure that the claims in substance and in practice amount to significantly more than a patent-ineligible abstract idea.

13. **Direct Infringement.** Upon information and belief, Defendant has been directly infringing and continues to infringe claim 9 of the ‘797 Patent in Texas, this District, and elsewhere in the United States. As shown below, Defendant’s use and testing of its home security system using an image-capturing mobile device, including but not limited to Wireless Doorbell cameras, Indoor security cameras, and Outdoor security cameras, such as ADC-V724, that perform the claimed method and infringes claim 9. For the purposes of demonstrating the infringement, Plaintiff uses Defendant’s ADC-V724 outdoor video camera as an exemplary image-capturing mobile device; however, the analysis is equally applicable to the use of Defendant’s other cameras.

Wireless Doorbell Camera

Who's at the front door? Screen visitors, and protect your packages with a Wi-Fi doorbell camera.

[Get a Quote](#)



Outdoor Security Cameras

Ever wonder what's out there in the dark? Use night vision security cameras to see who or what is out there.

[Get a Quote](#)

(<https://brinkshome.com/cameras>).

Indoor Security Cameras

Have teenagers? See what's happening at your home when you can't be there.

[Get a Quote](#)



(<https://brinkshome.com/cameras>).

ADC-V724 Outdoor Video Camera Guide

Specifications

- 1920 x 1080 pixel video resolution
- 117° field of view
- 45' infrared night-vision range
- MicroSD card slot
- Wi-Fi with two-way audio
- 12V – 1A DC power adapter (included)
- Operating temperature -4°F – 122° F (-20°C – 50°C)



Image-capturing mobile device

Features

- Two-way audio to hear and speak with visitors
- **Perimeter Guard**
- Microphone and speaker
- Video analytics for smarter detection and relevant alerts
- Onboard recording with Smart View for continuous, local, encrypted recordings
- High dynamic range (HDR)
- Wi-Fi (2.4 or 5 GHz)
- Audio included in recorded clips for additional awareness
- Works with the Brinks Home™ Mobile App
- Improved mount for long-term stability
- Easier access to microSD card door

(<https://brinkshome.com/help-center/articles/5123891961741-ADC-V724-Outdoor-Camera-Guide> (red box and text added))

14. For example, Defendant provides “an image-capturing mobile device,” e.g., an ADC-V724 outdoor video camera, which connects to the Brink’s Home app via Wi-Fi that users can install on their mobile devices. This camera features motion detection and geofencing capabilities, allowing users to define/mark a “virtual zone” for the camera. When motion is detected within the virtual zone, the camera alerts the user and transmits the recorded video or images to the paired mobile device running Brinks Home app.

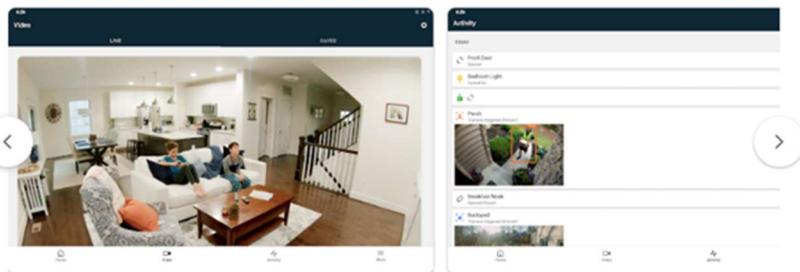
Brinks Home

Brinks Home™

100K+ Downloads  Rated for 3+ 

 Share  Add to wishlist

 This app is not available for your device



App support ^

-  Website
-  Phone number +18004479239
-  Support email CustomerCare@brinkshome.com
-  Privacy Policy

(https://play.google.com/store/apps/details?id=com.alarm.alarmmobile.android.moni&hl=en_US

(red box added)).

What To Expect From Your Installation

Our smart, state-of-the-art cameras are designed to help protect the things that matter most to you.



Perfect For Any Location

Indoor, outdoor, front door—our smart video cameras have you covered.



See What Matters

Customize your video alerts to focus on people, vehicles, animals or specific areas of your property.



Premium Technology

View high-quality video in 1080p even in the dark or low light.

[Get a Quote](#)

Discover the Power of Video Analytics

Our security cameras, powered by AI, offer intelligent video analytics, motion sensing, and night vision technology to pinpoint the activity you want to see.

(<https://brinkshome.com/cameras> (red boxes added)).

Geo-fencing, which uses your location to automatically take useful actions while you're out. These range from real-time notifications such as a garage door that's been left open to functions like adjusting your thermostator turning on your lights. Just define a circular "geo-fence" in your Brinks Home Security app and let your smartphone do the rest.

Real-time email, text, and push notifications for potential emergencies, such as home security alarms, break-ins, and equipment failures.

Notification for specific events, such as when your kids get home from school, or when your housekeeper or petsitter are in the house.

(https://play.google.com/store/apps/details?id=com.alarm.alarmmobile.android.moni&hl=en_US).).

Intelligent Video Analytics So You Don't Miss a Thing

Our best-in-class indoor and outdoor security cameras use the power of artificial intelligence for exceptional detection, day or night.



Perimeter Motion detection

Create virtual "zones" around specific areas you care about and receive alerts whenever motion is detected within your perimeter.

Intelligent Identification

Our video analytics service is a smart security upgrade that turns your video cameras into intelligent "security guards", able to classify moving objects as people, animals or vehicles.

Smart Device Integration

Set home automation rules to trigger smart devices, like lights, when motion is detected, giving you an intelligent new way to protect your home and family.

(<https://brinkshome.com/cameras> (red boxes added)).

Home Video Systems Designed to Fit Your Lifestyle



Live Video Surveillance

Get alerts and keep tabs on your home, family, and valuables, anytime, anywhere.



Customize Your Alerts

Choose to receive video clips and alerts in real time based on your preference and lifestyle.



On-Demand Storage

Easily access your security camera system's video footage in the cloud or on an SD card.



World-Class Data Security

Protect your video feed with unmatched data security. Add an extra layer of protection against hackers.



Buy Now, Pay Later

Don't want to pay up front? Take advantage of 0% APR financing options for your new security camera system.

(<https://brinkshome.com/cameras> (red box added)).

15. Defendant uses its image-capturing mobile devices to perform the step of "receiving a plurality of photographic images." For example, the ADC-V724 Outdoor Video

Camera captures and records video clips and images (“receiving a plurality of photographic images”) which are then stored either on a MicroSD card or in Brinks’ cloud storage.

ADC-V724 Outdoor Video Camera Guide

Specifications

- 1920 x 1080 pixel video resolution
- 117° field of view
- 45' infrared night-vision range
- MicroSD card slot
- Wi-Fi with two-way audio
- 12V – 1A DC power adapter (included)
- Operating temperature -4°F – 122° F (-20°C – 50°C)



(<https://brinkshome.com/help-center/articles/5123891961741-ADC-V724-Outdoor-Camera-Guide> (red box added)).

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Live Video Surveillance

Get alerts and keep tabs on your home, family, and valuables, anytime, anywhere.



Customize Your Alerts

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(<https://brinkshome.com/cameras> (red box added)).

16. Defendant uses its image-capturing mobile devices to perform the step of “filtering the plurality of photographic images using a transfer criteria.” For example, the outdoor video camera continually records and stores the captured videos and images on the memory card or in the cloud. Further, when motion or a human is detected within the designated virtual zone, the camera sends an alert to the Brinks Home app installed on the user’s mobile device, transmitting

the corresponding video clips and images, indicating the detected activity. Furthermore, users can also customize these alerts based on their preferences. Additionally, the Brinks Home app organizes the received video clips and images based on the events, such as human and motion detection. Therefore, the camera filters the captured images or videos (“the plurality of photographic images”) and sends them to associated mobile device running the Brinks Home app based on motion or human detection within the virtual zone created at the location of the camera (“using a transfer criteria”).

Home Video Systems Designed to Fit Your Lifestyle

| | | | | |
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|  |  |  |  |  |
| Live Video Surveillance Get alerts and keep tabs on your home, family, and valuables, anytime, anywhere. | Customize Your Alerts Choose to receive video clips and alerts in real time based on your preference and lifestyle. | On-Demand Storage Easily access your security camera system's video footage in the cloud or on an SD card. | World-Class Data Security Protect your video feed with unmatched data security. Add an extra layer of protection against hackers. | Buy Now, Pay Later Don't want to pay up front? Take advantage of 0% APR financing options for your new security camera system. |

(<https://brinkshome.com/cameras> (red box added)).

Intelligent Video Analytics So You Don't Miss a Thing

Our best-in-class indoor and outdoor security cameras use the power of artificial intelligence for exceptional detection, day or night.

| | | |
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|  |  |  |
| Perimeter Motion detection Create virtual “zones” around specific areas you care about and receive alerts whenever motion is detected within your perimeter. | Intelligent Identification Our video analytics service is a smart security upgrade that turns your video cameras into intelligent “security guards”, able to classify moving objects as people, animals or vehicles. | Smart Device Integration Set home automation rules to trigger smart devices, like lights, when motion is detected, giving you an intelligent new way to protect your home and family. |

(<https://brinkshome.com/cameras> (red box added)).

What To Expect From Your Installation

Our smart, state-of-the-art cameras are designed to help protect the things that matter most to you.

Perfect For Any Location
Indoor, outdoor, front door—our smart video cameras have you covered.

See What Matters
Customize your video alerts to focus on people, vehicles, animals or specific areas of your property.

Premium Technology
View high-quality video in 1080p even in the dark or low light.

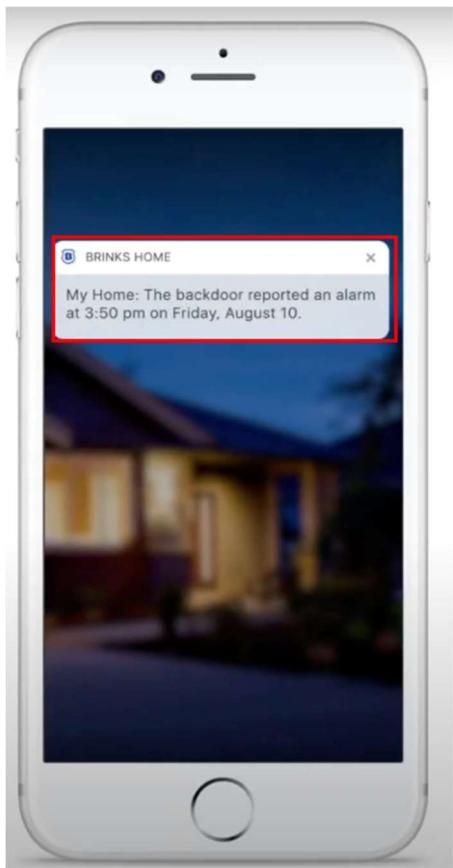
filtering the plurality of photographic images using a transfer [criteria](#)

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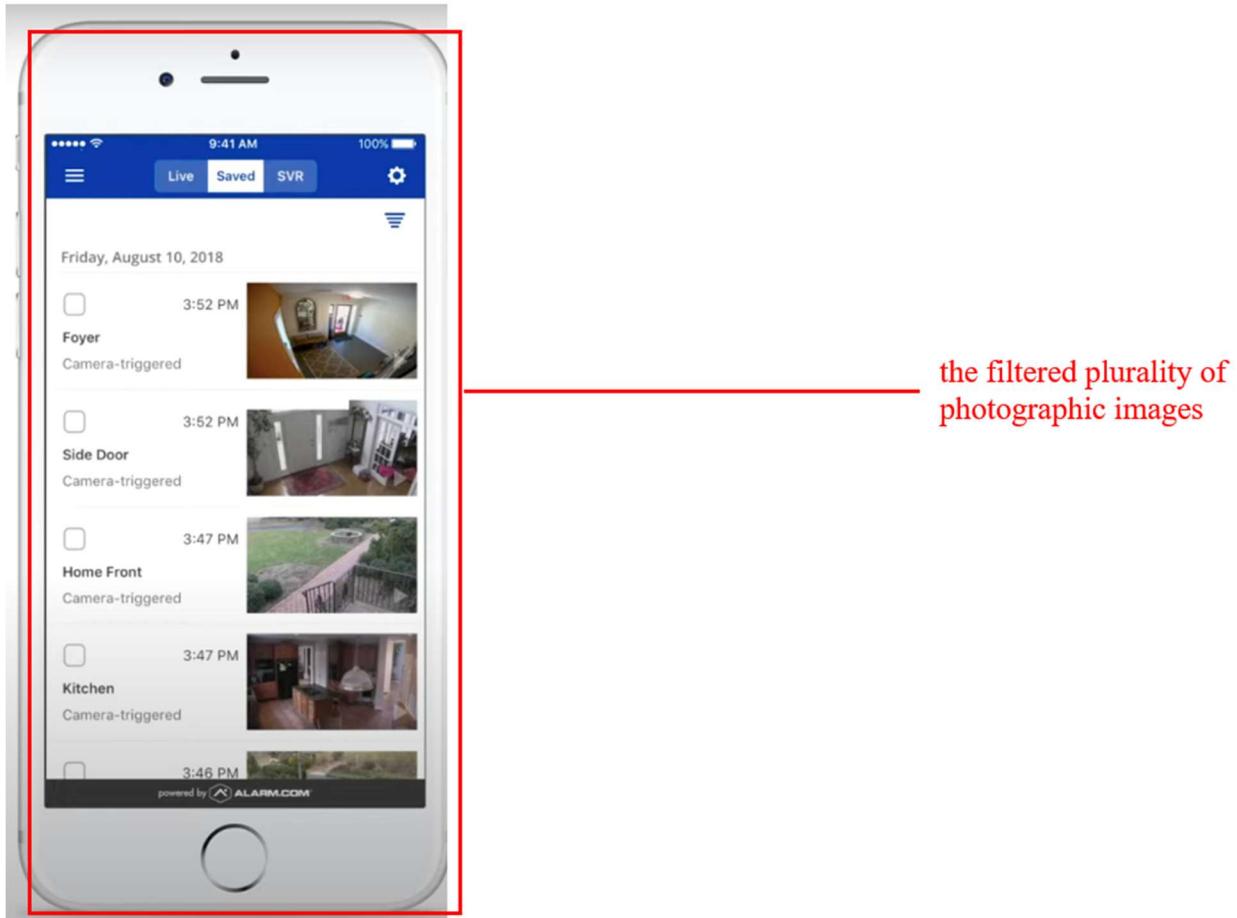
Discover the Power of Video Analytics

Our security cameras, powered by AI, offer intelligent video analytics, motion sensing, and night vision technology to pinpoint the activity you want to see.

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(https://www.youtube.com/watch?v=mSR_0MSfSkU&t=23s , at 0:31 (red box added).



(https://www.youtube.com/watch?v=mSR_0MSfSkU&t=23s, at 0:35 (red box and text added)).

17. Defendant uses its image-capturing mobile devices to perform the step of “transmitting, via a wireless transmitter and to a second image-capturing device, the filtered plurality of photographic images.” For example, after filtering the captured video clips and images based on motion or human detection, the camera sends the captured video clips and images (“the filtered plurality of photographic images”) to the Brinks Home app, installed on the user’s mobile device (“second image-capturing device”), and connected through the Wi-Fi network. Therefore, the ADC-V724 Outdoor Video Camera contains an embedded wireless transmitter, enabling it to send alert notifications and the captured images.

ADC-V724 Outdoor Video Camera Guide

Specifications

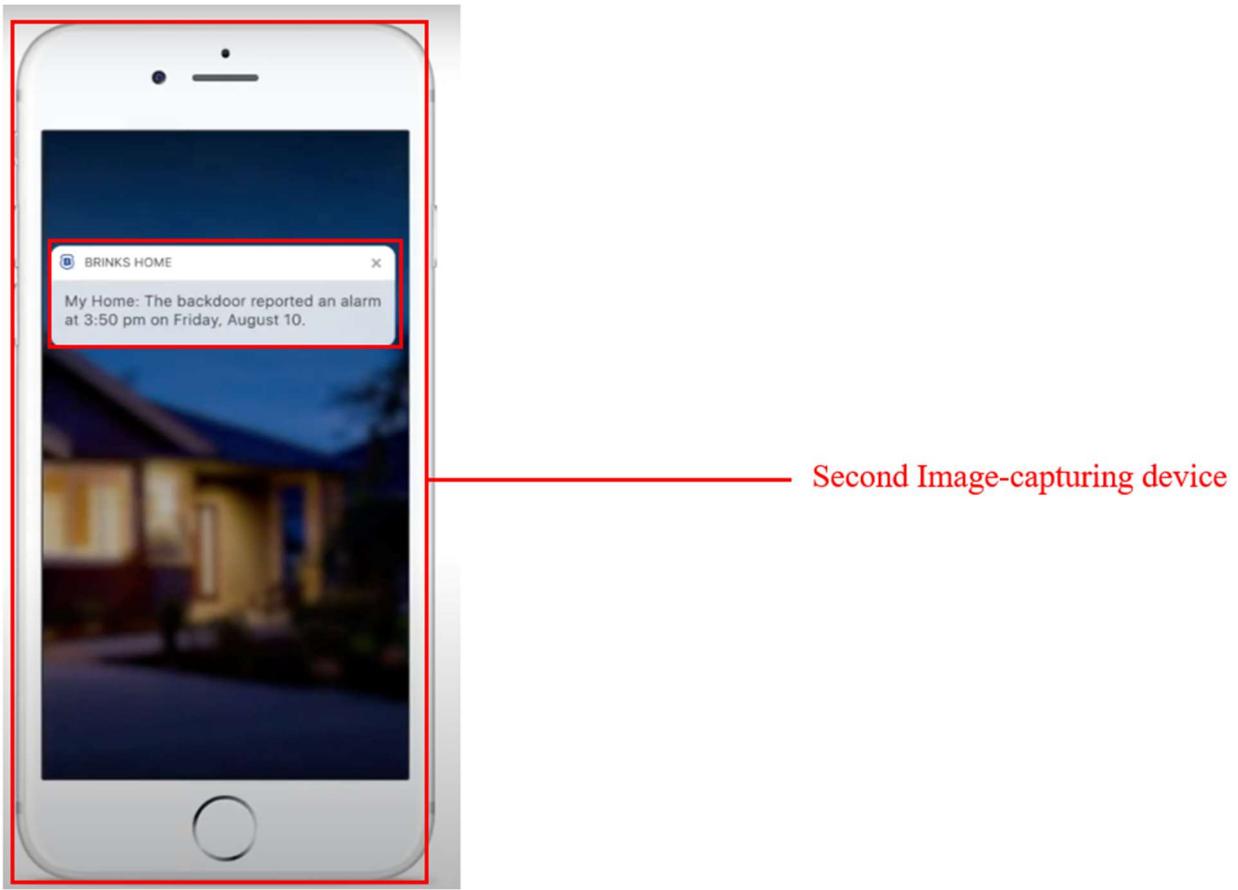
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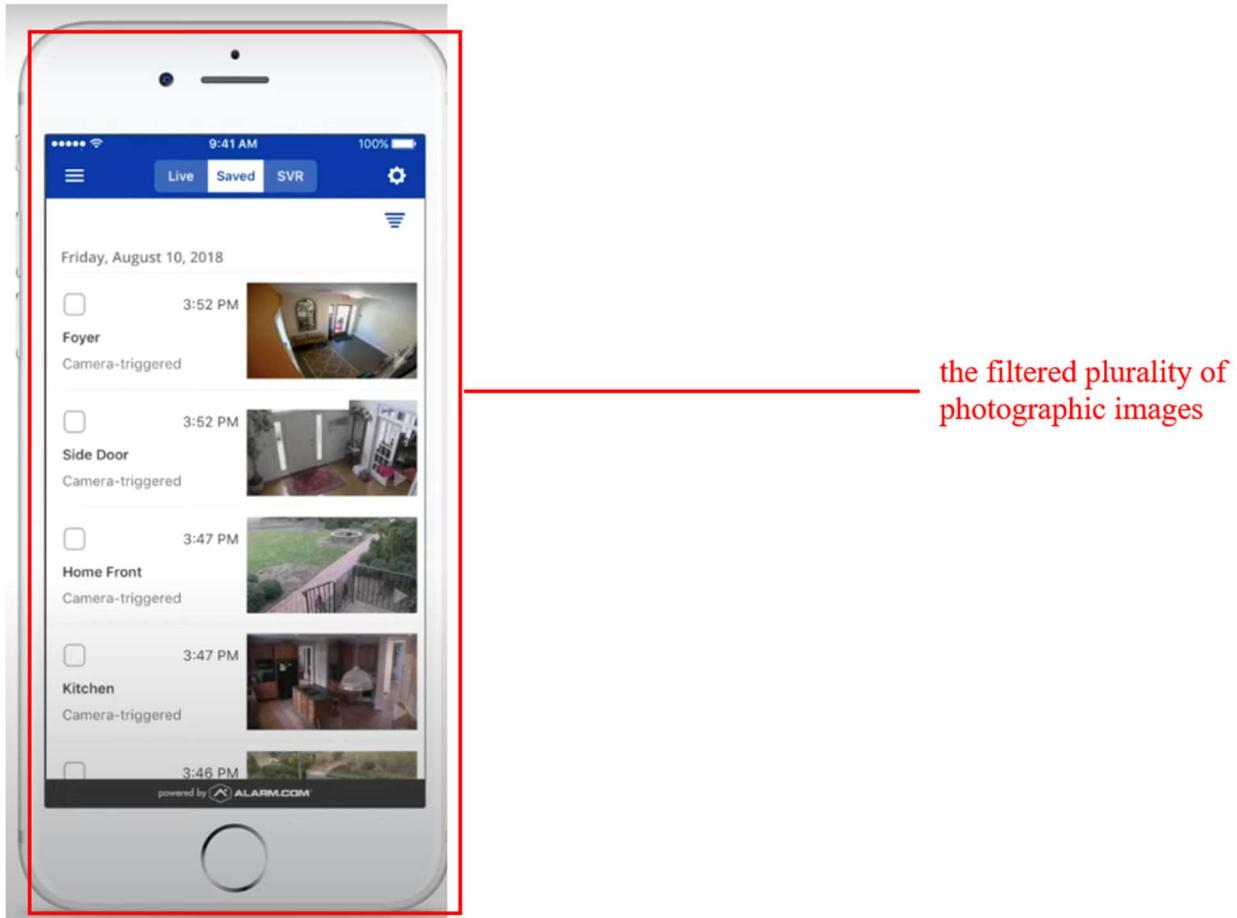
Features

- Two-way audio to hear and speak with visitors
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(https://www.youtube.com/watch?v=mSR_0MSfSkU&t=23s, at 0:35 (red box and text added)).

18. Defendant uses its image-capturing mobile devices to perform the step wherein “the transfer criteria is a geographic location of the image-capturing mobile device.” For example, after the connection is established between the ADC-V724 Outdoor Video Camera (“the image-capturing mobile device”) and the Brinks Home app installed on the user’s mobile device, the camera sends alert notifications and the captured video recording or images to the user’s mobile device whenever motion or a person is detected within the virtual zones designated at the camera’s location (“the transfer criteria is a geographic location of the image-capturing mobile device”).



Perimeter Motion detection

Create virtual “zones” around specific areas you care about and receive alerts whenever motion is detected within your perimeter.

(<https://brinkshome.com/cameras> (red box added)).

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the transfer criteria is a geographic location of the image-capturing mobile device

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Home Video Systems Designed to Fit Your Lifestyle

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|  <p>Live Video Surveillance</p> <p>Get alerts and keep tabs on your home, family, and valuables, anytime, anywhere.</p> |  <p>Customize Your Alerts</p> <p>Choose to receive video clips and alerts in real time based on your preference and lifestyle.</p> |  <p>On-Demand Storage</p> <p>Easily access your security camera system's video footage in the cloud or on an SD card.</p> |  <p>World-Class Data Security</p> <p>Protect your video feed with unmatched data security. Add an extra layer of protection against hackers.</p> |  <p>Buy Now, Pay Later</p> <p>Don't want to pay up front? Take advantage of 0% APR financing options for your new security camera system.</p> |
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(<https://brinkshome.com/cameras> (red box added)).

19. **Induced Infringement.** Upon information and belief, Defendant has been and now is inducing infringement of claim 9 of the ‘797 patent in the State of Texas, in this District, and elsewhere in the United States, by providing the image-capturing mobile devices and Brinks Home app for use by Defendant’s customers to perform a method that infringes claim 9 as described above. (*Supra ¶¶12-17*). At least as of the filing of this lawsuit and service of the Complaint, Defendant has had knowledge of the ‘797 Patent, knowledge that the use of the image-capturing mobile devices and Brinks Home app infringed claim 9 of the ‘797 Patent, and that this use of the image-capturing mobile devices and Brinks Home app by its customers constituted direct patent infringement. Despite this knowledge of infringement of claim 9 of the ‘797 patent, Defendant continued to encourage and induce its customers to use the image-capturing mobile devices and Brinks Home app by providing the image-capturing mobile devices and Brinks Home app to its customers with instructions (as described above) for use in a manner that infringed claim 9 of the ‘797 patent. Through maintenance and operation of the image-capturing mobile devices and Brinks Home app, when Defendant’s customers use the image-capturing mobile devices and Brinks Home app, Defendant is and has been committing the act of inducing infringement by specifically intending to induce infringement by providing the image-capturing mobile devices and Brinks Home app to its customers and by aiding and abetting its use in a manner known by

Defendant to infringe claim 9 of the ‘797 Patent. Specifically, Defendant provides the image-capturing mobile devices to its customers knowing that the image-capturing mobile devices will be used to receive a plurality of photographic images, filter the photographic images using a transfer criteria which is a geographic location of the image-capturing device, and transmitting by way of a wireless transmitter to a second image-capturing device the filtered photographic images. (*Supra ¶¶12-17*). Defendant also provides the Brinks Home app and instructs its customers to install the Brinks Home app on the customer’s mobile phone, laptop, or tablet (“second image-capturing device”) and further instructs its customers how to use the Brinks Home app to set up a filter for the photographic images captured by the Brinks image-capturing device purchased by the customer using a transfer criteria that is a geographic location of the image-capturing mobile device. (*Supra ¶¶12-17*). Furthermore, Defendant instructs its customers to download the Brinks Home app so that the customer’s mobile phone, laptop, or tablet can receive the filtered photographic images. (*Supra ¶¶12-17*). Defendant therefore knowingly induced infringement and specifically intended to encourage and induce the infringement of claim 9 of the ‘797 patent by its customers. Even where performance of the steps required to infringe claim 9 of the ‘797 Patent is accomplished by Defendant and Defendant’s customer jointly, Defendant’s actions have solely caused each of the steps to be performed.

20. Plaintiff has been damaged as a result of Defendant’s infringing conduct. Defendant is thus liable to Plaintiff for damages in an amount that adequately compensates Plaintiff for such infringement of the ‘797 Patent, *i.e.*, in an amount that by law cannot be less than would constitute a reasonable royalty for the use of the patented technology, together with interest and costs as fixed by this Court under 35 U.S.C. § 284.

21. On information and belief, Defendant will continue its infringement unless enjoined by the Court. Each and all of the Defendant's infringing conduct thus causes Plaintiff irreparable harm and will continue to cause such harm without the issuance of an injunction.

22. The asserted claim of the '797 Patent (Claim 9) is a method claim to which the marking requirements are not applicable. Plaintiff has therefore complied with the marking statute 35 USC 287.

V. JURY DEMAND

Plaintiff, under Rule 38 of the Federal Rules of Civil Procedure, requests a trial by jury of any issues so triable by right.

VI. PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that the Court find in its favor and against Defendant, and that the Court grant Plaintiff the following relief:

- a. Judgment that claim 9 of United States Patent No. 8,437,797 has been infringed directly and indirectly, either literally and/or under the doctrine of equivalents, by Defendant;
- b. Judgment that Defendant account for and pay to Plaintiff all damages to and costs incurred by Plaintiff because of Defendant's infringing activities and other conduct complained of herein, and an accounting of all infringements and damages not presented at trial;
- c. That Defendant be permanently enjoined from any further activity or conduct that infringes;
- d. That Plaintiff be granted pre-judgment and post-judgment interest on the damages caused by Defendant's infringing activities and other conduct complained of herein; and
- e. That Plaintiff be granted such other and further relief as the Court may deem just and proper under the circumstances.

March 18, 2025

Respectfully Submitted,

Of Counsel:

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Attorneys for Rothschild Patent Imaging LLC

CERTIFICATE OF SERVICE

I hereby certify that on March 18, 2025, I electronically filed the above documents with the Clerk of Court using CM/ECF which will send electronic notification of such filings to all registered counsel.

/s/ _____